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8	BEFORE THE
9	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS
10	STATE OF CALIFORNIA
11	In the Matter of the Accusation Against: Case No. 2013-814
12	JAIME LYNNE LANGELIER, AKA JAIME LYNNE VALENZANO
13	2838 San Miguel Drive A C C U S A T I O N
14	Lancaster, CA 93535
15	Registered Nurse License No. 766225
16	Respondent.
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18	Complainant alleges:
19	<u>PARTIES</u>
20	1. Louise R. Bailey, M.Ed., R.N. (Complainant) brings this Accusation solely in her
21	official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22	Consumer Affairs.
23	2. On or about January 28, 2010, the Board of Registered Nursing issued Registered
24	Nurse License Number 766225 to Jaime Lynne Langelier, aka Jaime Lynne Valenzano
25	(Respondent). The Registered Nurse License was in full force and effect at all times relevant to
26	the charges brought herein and will expire on June 30, 2013, unless renewed.
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JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), under the authority of the following laws. All section references are to the Business and Professions Code (Code), unless otherwise indicated.

STATUTORY PROVISIONS

- 4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.
 - 6. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct . . . "

COST RECOVERY

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

DRUGS

8. Methadone, a synthetic opiate, is a Schedule II controlled substance as designated by Health and Safety Code section 11055(c)(14) and a dangerous drug according to Business and Professions Code section 4022. It is used to treat drug addiction.

- 9. Fluoxetine HCL (Prozac) is a selective serotonin reuptake inhibitor and is categorized as a dangerous drug pursuant to section 4022 of the Code. It is used to treat depression.
- 10. Losartan (Cozaar) is an angiotensin II receptor antagonist. It is categorized as a dangerous drug pursuant to Business and Professions Code section 4022 and is used to treat high blood pressure (hypertension).
- 11. Divalproex TBEC (Depakote) is categorized as a dangerous drug pursuant to Business and Professions Code section 4022. It is used to treat seizure disorders.
- 12. Levetiracetam (Keppra) is categorized as a dangerous drug pursuant to Business and Professions Code section 4022. It is used to treat seizure disorders.

FACTUAL SUMMARY

- 13. On or about May 22, 2010, patient GL, an 83-year-old female, was admitted to the intensive care unit of Antelope Valley Hospital, Lancaster, California (AVH), with a diagnosis of chronic obstructive pulmonary disease, congestive heart failure, clostridium difficile colitis, pneumonia and renal failure. Patient GL was kept in the intensive care unit for three days. On or about May 25, 2010, patient GL was transferred to the telemetry unit because her condition had improved.
- 14. On May 25, 2010, AVH's pharmacy mistakenly inputted medications that had not been ordered into patient GL's Medication Administration Record (MAR), specifically, Methadone, Fluoxetine (Prozac), Losartan (Cozaar), Divalproex TBEC (Depakote) and Levetiracetam (Keppra). MARs are issued by the pharmacy in the evening to be used by the hospital's nurses to care for their patients the next day.
- 15. It is the policy of AVH that the night shift nurse assigned to a patient is required to verify the new Medication Administration Record (MAR) for that patient to prevent medication errors. On May 25, 2010, the night nurse failed to verify/correct the new MAR for patient GL.
- 16. In the morning of May 26, 2010, while on duty as a registered nurse in AVH's telemetry unit during the day shift (0700 to 1900 hours), Respondent administered to patient GL the medications that were erroneously listed on the MAR that were left uncorrected/unverified by the night nurse, except that she did not administer the Methadone. Respondent did not reconcile

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the list of medications ordered by the physician to the MAR before administering the medication listed on the MAR to the patient. She did not confirm the rationale for the medication on the MAR by checking the patient's medical history, the reason she was taking each medication, and the possible side effects of each medication prior to administration.

17. After Respondent administered the wrong medications to patient GL, her condition deteriorated, and she was transferred back to the ICU, where she was declared brain dead and died on May 28, 2010, at 1300.

CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

18. Respondent is subject to disciplinary action under section 2761, subdivision (a), in that while on duty as a registered nurse at AVH, Respondent committed unprofessional conduct by failing to verify that the medication on the patient's MAR was ordered by a physician and that the medication was indicated for the patient's condition prior to administering the medication. Complainant refers to and by this reference incorporates the allegations set forth above in paragraphs 13 through 17, as though set forth fully.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Revoking or suspending Registered Nurse License Number 766225, issued to Jaime Lynne Langelier, aka Jaime Lynne Valenzano;
- Ordering Jaime Lynne Langelier to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,
 - 3. Taking such other and further action as deemed necessary and proper.

DATED: March 21, 2013

LOUISE R. BAILEY, M.ED., R.N.

Executive Officer

Board of Registered Nursing, Special Investigator

State of California

Complainant